

CHRISTOPHER CHIOU
Acting United States Attorney
Nevada Bar Number 14853
JARED L. GRIMMER
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6336/Fax: (702) 388-6418
jared.l.grimmer@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:21-mj-00749-DJA

Plaintiff,

Stipulation for an Order Directing Probation to Prepare a Criminal History Report

JOSE ABEL DE LOS SANTOS-NINO,
aka "Jose Abel Delossantos,"
aka "Jose Abel de los Santos,"
aka "Jose Dejesus Delossantos,"
aka "Ninojose Abel Delossantos,"

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Margaret Wightman Lambrose, Assistant Federal Public Defender, counsel for Defendant JOSE ABEL DE LOS SANTOS-NINO, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1. The United States Attorney's Office has developed an early disposition program for immigration cases, authorized by the Attorney General pursuant to the PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has extended to the defendant a plea offer in which the parties would agree to jointly request an expedited sentencing immediately after the defendant enters a guilty plea.

2. The U.S. Probation Office cannot begin obtaining the defendant's criminal history until after the defendant enters his guilty plea unless the Court enters an order directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of a defendant's initial appearance when charged by indictment.

3. The U.S. Probation Office informs the government that it would like to begin obtaining the criminal history of defendants eligible for the early disposition program as soon as possible after their initial appearance so that the Probation Office can complete the Presentence Investigation Report by the time of the expected expedited sentencing.

4. Accordingly, the parties request that the Court enter an order directing the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

DATED this 7th day of September, 2021.

Respectfully Submitted,

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Margaret W. Lambrose
MARGARET WIGHTMAN LAMBROSE
Assistant Federal Public Defender
Counsel for Defendant JOSE ABEL
DE LOS SANTOS-NINO

/s/ Jared L. Grimmer
JARED L. GRIMMER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:21-mj-00749- DJA

Plaintiff,

Order Directing Probation to Prepare a Criminal History Report

V.

JOSE ABEL DE LOS SANTOS-NINO,
aka "Jose Abel Delossantos,"
aka "Jose Abel de los Santos,"
aka "Jose Dejesus Delossantos,"
aka "Ninojose Abel Delossantos,"

Defendant.

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 10th day of September, 2021.

DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE